

QMN PROCEDURE: Due Diligence Procedure (Cultures & Histories and Biodiversity & Geoscience Programs)

1.0 PURPOSE

The purpose of this procedure is to clarify the process which must be undertaken in order to ensure the Museum only acquires or borrows material where the vendor, donor or lender has legal title; where provenance is established, the items are authentic and there is no evidence that they have been looted or illegally obtained or exported.

In addition, it also outlines the process for due diligence with regard to lending material to external borrowers.

2.0 SCOPE

This procedure applies to staff of the Cultures & Histories and Biodiversity & Geosciences Programs. It relates to objects or specimens being considered for purchase, gift (including via the Australian Government's Cultural Gifts Program), donation, custodianship, bequest, exchange or for loan. It must be read in conjunction with *QM305 Due Diligence Policy*.

3.0 DEFINITIONS

Ancestral remains refer to skeletal remains, soft tissue or hair samples of deceased Aboriginal People or Torres Strait Islanders. It also includes any plaster casts of Aboriginal People or Torres Strait Islanders remains.

Accessioned Items are Objects or Specimens or Specimen Lots that have been incorporated into the State Collection through the formal process of Registration (numbering), and Accessioning (recording locality and other contextual information in an electronic database).

An **archaeological specimen** is a product of manufacture, alteration or use that may have been modified by or deposited due to human activities. It is primarily of value for its prehistoric, historic, cultural or scientific significance, and discovered on or beneath land or submerged or partially submerged beneath the surface of any water course or permanent body of water. Such objects may derive from Indigenous, historical, maritime, prehistoric or classical contexts, including stone, plant, faunal, ceramic, glass, metal, charcoal, sedimentological or other materials.

Biological Material includes any living or dead specimens, biologically-derived material such as tissue samples, skeletal elements or parts of specimens, or material which contains biological agents including bacteria, viruses, micro-organisms, genetically modified organisms / micro-organisms which might pose a risk to health and safety of individuals or the environment.

Burial goods or **grave goods** refer to items found with Ancestral Remains such as bark coffins and other objects.

Collection Checklist is a list specific to each collection area based on the expert knowledge of the related Curator, which highlights any high risk issues relating to the objects or specimens being considered for loan or acquisition – such as the country of origin, the specific lending institution, or the type of item. (As outlined in *QM306: Due Diligence Procedure*.)

A **Collection item** is an Object or Specimen and associated data that has been formally acquired by QMN.

Cultural material is physical and documentary material that represents the intangible and tangible elements of individual cultures. Such material may be, may refer to, may represent or may be a component of specific practices or knowledge systems. It includes but is not limited to artistic works including visual, performing and literary works, moveable cultural property, Ancestral Remains and other sensitive materials, photographic, film, and sound recordings and all forms of documentation which include any elements of culture - past, present and future.

Documentation is supporting evidence, recorded in a permanent manner using a variety of media (paper, photographic, electronic etc.) of the identification, condition, history, or significance of an Object, Specimen or collection. This encompasses information that is inherent to the individual Object / Specimen and its associations in its environment as well as that which reflects processes and transactions affecting the Object / Specimen (e.g. Accessioning, documenting, loaning, analysis, treatment etc.). Documentation is an integral aspect of use, management and preservation of an Object, Specimen or collection. All digital and paper based documentation must be collected, maintained and stored in accordance with *QM318 Collection and Research Record Keeping Policy*.

Due diligence - all the required endeavours to establish the facts of a case before deciding a course of action, particularly in identifying the source and history of an item offered for acquisition, use before acquiring it or for inward and outward loans.

An **Item** is an interchangeable term used for an Object, record, Specimen or Specimen lot.

A **Letter of comfort** is a communication from one party to another party that indicates a willingness to enter into a contractual obligation absent of the elements of a legally enforceable contract. The objective is to create a morally binding but not legally binding assurance. (Despite their nonbinding status, letters of comfort nonetheless provide risk mitigation because the initiating party is putting its own reputation in jeopardy.)

Lot is the term used to define a group of Specimens or Objects recovered from the same location at the same time, which are registered, accessioned, stored and documented together for efficiency reasons based on manageable quantities of Objects (e.g. multiple specimens of insects, fishes, small crustaceans).

An **Object** is a human-made item, often manufactured or created from naturally-occurring materials and made for use in a cultural context. This term differentiates human-made collection items from those acquired in nature (Specimens).

PCOL the *Protection of Cultural Objects on Loan Act 2013*; supports the future of international cultural exhibitions in Australia by providing a scheme (governed by the *Protection of Cultural Objects on Loan Regulation 2014*) to protect Australian and foreign cultural objects on loan from overseas for temporary public exhibition

'Pre-packaged' exhibition is an exhibition or display (touring or non-touring, local, national or international) developed by an external organising body such as a museum, gallery, commercial entity, community group or artist; governed by a specific contract.

Provenance an objects full history and ownership from the time of its discovery or creation to the present day, through which authenticity and ownership are determined.

QMN means the Queensland Museum Network

QMATSICC is the Queensland Museum Aboriginal and Torres Strait Islander Consultative Committee, a group of community representatives which has the responsibility of advising the QM Board of issues, and to consult with communities.

Research Collection consists of Objects or Specimens for research or loan generally intended to be kept indefinitely, but not individually registered or had a significance assessment undertaken (see Lot). Specimens retained for destructive analysis are managed as part of the Research Collection.

Reserve Collection items are held by various programs and campuses of QMN specifically for the purpose of public display, teaching, public education and or interpretation, non-scientific loans, etc. The former group of items do not meet QMN criteria for state significance, are not accessioned into the State Collection, nor intended to be held in perpetuity.

Restricted Collection pertains to a Collection Item, image, data or information, to which unrestricted access may cause offence or endanger the safety or sanctity of that item, image, data or information, or the survival of the population from which the material was collected. Restricted Collection Items may include rare and threatened species, species of significant commercial value, secret and sacred objects, etc.

Secret Sacred objects are objects with intrinsic cultural significance to Aboriginal Peoples and/or Torres Strait Islanders. This material is traditionally subject to restrictions and/or protocols regarding interpretation, storage, access and use.

Senior Decision Maker this will depend on which process is being undertaken (acquisition, incoming loan, international exhibition etc.) and at what level approval is being sought. It could be the relevant Program Head, Director or CEO, and may differ depending on the specific circumstances of the situation (for example, an issue may be elevated to a higher decision making level if necessary). In some cases this role is replaced by a **Project Board** (The Project Board provides overall direction and management to a project, such as a major exhibition, and is accountable for the success of the project. The Project Board is comprised of a Project Executive (often the CEO), Senior User/s, and Senior Supplier/s. The Project Executive is the ultimate decision maker and is supported in the decision making process by the Senior User and Senior Supplier.)

Sensitive Material is anything which requires special protection from disclosure or specific treatment. It is material which can potentially cause offense, distress, embarrassment or threat to members of the community. It can be political, medical, religious, social, cultural or sexual in nature and can be in the form of information, images, objects or activities.

Specimen means any animal or plant, or any part, product, egg, seed, or root of any animal or plant or geological sample.

State Collection is the official collection of Items registered by QMN through Acquisition or Transfer. It is the sum total of all Accessioned items of scientific or historical significance vested in the Board of QM.

Type Specimen is a zoological, paleontological or mineral Item that serves as the basis for the name of the taxon (i.e. for identification of unnamed material through comparison with the type). Primary Types (holotype, neotype, lectotype etc.) and secondary Types (paratype, paralectotypes etc.) underpin the concept of the species and its variability in nature. QMN Type Specimens are irreplaceable Items of vital national and international significance for scientific research and identification verification.

4.0 ACTIONS

Staff must make all reasonable efforts to verify the accuracy and authenticity of information in relation to objects and specimens before deciding a course of action. Staff must be aware that acquiring or borrowing material with uncertain provenance may risk supporting trade in looted objects, result in the destruction of cultural sites or illegal excavations, or even contribute to the loss of endangered species.

Staff are required to make professional judgements in relation to the extent of **due diligence** that might be necessary, on a case by case basis, depending on the specific situation and the type of objects or specimens in question. Staff must assess the potential risks and balance the resources required in each situation in order to mitigate those risks, in accordance with *QM305 Due Diligence policy*. (For example, when acquiring a collection consisting of a large number of specimens, it may not be necessary to apply **due diligence** to each and every item, but to assess only those which might pose an inherently higher risk than others, such as foreign material.)

The basic principles of **due diligence** require staff to:

- evaluate documentary evidence, identify gaps in information and consider historical and current legal requirements
- document the research process, identify risks and ensure **Senior Decision Makers** (such as the Program Head, relevant Director or CEO) are alerted to any issues
- be accountable and transparent in their recommendations, which must be both ethical and reasonable
- seek legal expertise if deemed appropriate

- consult relevant communities particularly in regard to material relating to Aboriginal and Torres Strait Islander people, see **4.1.8** Consultation below

(In the case of biodiversity specimens, it may be helpful to contact the **Department of Environment and Heritage Protection** (DEHP) (such as the *Manager of Threatened Species* or the *Director of Wildlife Management*) for additional information and support.)

4.1 Process of Due Diligence

4.1.1 Determining Provenance

Staff must assess the reputation of the vendor, donor or lender and ascertain that they have legal title / authority to sell, give or lend the material in question. This assessment of the entity may include but not be limited to investigations into its financial stability and/or its practices supporting good governance. (this applies equally to entities lending specimens borrowed for research as well as objects borrowed for display or exhibition and long term loan).

Provenance of the object must be done through the independent examination of documentary evidence associated with the history of ownership of the material, utilising both primary and secondary sources, ensuring the accuracy and authenticity of the information. For example, staff must:

- examine the exhibition and publication history of the material, excavation permits, management plans, field notes, reports, receipts, general permits, correspondence and any other form of documentation associated with the history of the item. (This must be done by obtaining copies from the vendor, donor or lender and/or by sourcing them through independent research channels.)
- consult with experts in the country of origin and those in other institutions
- determine if there are any outstanding title or ownership claims or judgements in relation to the specific vendor, donor or lender
- where necessary check the material against international databases or registers of stolen art (such as the *Art Loss Register*, INTERPOL, UNESCO Red Lists) or national databases located in the relevant country
- in the case of biodiversity specimens, it may be helpful to contact the **Department of Environment and Heritage Protection** (DEHP) (such as the *Manager of Threatened Species* or the *Director of Wildlife Management*) for additional information. While the DEHP are unable to provide lists of offenders, due to Privacy constraints, they are able to confirm if a potential donor or lender is 'known' to the Department on legal or ethical grounds.

A sound provenance is based on a verifiable documented history of the ownership of the object or specimen, including names and dates of ownership, means of transference, (e.g. inheritance or sale through a reputable dealer or auction house) and locations where the item was kept from the point it was created or located until the present day.

When assessing the ethical and legal history of an item, particular attention must be given to certain types of material or countries of origin where the risk of illicit trade is high, such as:

- objects acquired during or shortly after times of conflict, social upheaval or natural disasters.
- archaeological and paleontological items that could have been stolen from historic sites in risk regions such as Africa, Asia, Latin America, India, Papua New Guinea and the Pacific.
- objects that could have been stolen from museums, private collections, religious and historic buildings.
- specimens of certain species which are known to be commonly traded on the black market

(Program staff must work together to draw up *QM320 Collection Checklists* identifying high risk areas of concern specific to their particular collection and area of expertise, which can be provided to the relevant **Senior Decision Maker** in order to enable them to determine where additional research or investigation may be required prior to approving or not approving a loan or acquisition to proceed.

Copies of these as all other **due diligence** documentation must be retained in accordance with *QM318 Collection and Research Record Keeping Policy*.)

4.1.2 Items requested for external loan

All external loans must be conducted in accordance with *QM64 Loans Policy (Inwards & Outwards)* and *QM2 Procedure for Outward Research Loans* and *QM66 Procedure for Outward Exhibition Loans*.

When items are requested for external loan staff must determine if **due diligence** was applied at the time the items were originally acquired; with regard to legal title, accuracy and authenticity of information. If this was not the case, then all reasonable measures must be taken with regard to filling any gaps in the research process in order to clarify these issues prior to loan. All documentation must be scanned and attached to the relevant record in Vernon (where one exists) and hard copies must be kept in the appropriate file located in the Collections and Research Records area (whether that is the designated CRRC located in the QM&S Library or a campus / Collection specific repository) in accordance with *QM319 Collections and Research Record Keeping Procedure*.)

If any concerns remain after this process has been implemented, the appropriate **Senior Decision Maker** must be informed, as it may be necessary to decline specific items from being loaned.

4.1.3 Items requested for inward loan

All external loans must be conducted in accordance with *QM64 Loans Policy (Inwards & Outwards)* and *QM36 Procedure for Inward Research Loans* and *QM73 Procedure for Inward Exhibition Loans*.

Staff must undertake an appropriate degree of **due diligence** to assess all incoming loans, and in the case of international loans for exhibition they must also do so in accordance with the guidelines of the Protection of Cultural Objects on Loan (PCOL) Scheme under the *Protection of Cultural Objects on Loan Act 2013*. In all cases they are required to exercise the highest levels of ethical and professional practice in order to ensure that material has not been acquired illegally, or exported from the country of origin in violation of that country's laws; specifically they must adhere to the legislation and conventions outlined in the loan procedures.

Staff must determine if the lender is able to supply comprehensive **due diligence** documentation for each item being borrowed; with regard to legal title, accuracy and authenticity of information. If this is not the case, then all reasonable measures must be taken by staff to fill any gaps in the documentation in order to clarify these issues prior to loan. This information must be collated along with provision of a *QM320 Collection Checklist* and supplied to the **Senior Decision Maker**, who will ultimately assess the overall risk and make the decision about whether a loan will go ahead or not.

All documentation must be scanned, attached to the relevant record in Vernon (where one exists) and maintained in the appropriate file, as for Outward Loans, and in accordance with *QM319 Collections and Research Record Keeping Procedure*.

With regard to **pre-packaged exhibitions**, the QM&S Senior Creative Producer, Major Projects (or designate/equivalent role at QMN campuses) who is responsible for managing these; is required to exercise the same degree of ethical and professional practice as Program staff who manage all other kinds of Inward Loans. They too must seek **due diligence** information from the lender and supply this to the relevant Program Head for assessment and determination of risks. Again all of this information is supplied to the **Senior Decision Maker** who will ultimately decide whether specific items will be borrowed as part of the loan or not. (In this case the hard copy documents are stored in the appropriate file in the QMN Central Records repository and all electronic documents are stored in a secure folder in Q drive in a specific **Due Diligence** folder during the period of the exhibition and transferred to e-File for archiving after the exhibition period ends.)

4.1.4 Items for purchase

When purchasing items, consideration must be given to the 'asking price' compared to the 'market price'. Staff must ensure they are familiar with the price of items on the open market by consulting auction house results, other institutions and if necessary independent valuers. Questions must be asked of the vendor if they are offering an item for sale at a considerably lower price than would seem appropriate.

(Also bear in mind that it can be illegal to buy and sell certain types of cultural material, so ascertain if this is the case for the specific material in question.)

4.1.5 Legal export

Staff must ensure the vendor, donor or lender has or can obtain the necessary valid export licences or permits:

- check what permits or licences are required by contacting the relevant government authority from the country in which the item is currently held.
- seek documentary evidence that when the item left its country of origin (if different from where it is currently held) the correct permits were obtained at the time. (Bear in mind that legal requirements may well have changed, so it is important to determine what was actually required at the time when it was **originally** exported.)

4.1.6 Legal import

Staff must also check the status of items prior to import into Australia:

- check that items are not classified by Department of Immigration and Border Protection as either [Restricted or Prohibited](#) imports.
- Under the *Protection of Movable Cultural Heritage Act 1986* [certificates of exemption](#) are required to allow Class A and B Australian protected objects, which are currently overseas, to be imported temporarily into Australia and subsequently re-exported.

4.1.7 Physical examination

Where possible, staff must conduct a physical examination of the item or at the very least inspect detailed photographs in order to assist with determining authenticity and accuracy of information. For example, there may or may not be evidence of the following, which could provide essential information to support or discount provenance:

- prior use or wear
- soil deposits indicating previous burial or excavation
- damage sustained during removal from a larger structure
- damage indicative of the item being part of a larger object
- damage sustained from the effects of war or civil unrest (such as bullet holes)
- remains of museum or auction house numbers / labels
- evidence of recent breakage, or modern methods of manufacture inconsistent with the object type.
- contextual information associated with the object/collection

For further insight into the life of the item staff must ask to see any:

- conservation assessments or condition reports
- scientific examination or test results
- inscriptions, labels and other identifying marks

4.1.8 Consultation

Staff must also consider whether to consult (in person, verbally, visually or in written form) with expert individuals, groups or communities if the material relates specifically to them; such as:

- if an item relates to a particular person, group, event, place or activity
- has specific family associations
- has social or spiritual significance
- embodies beliefs, ideas, customs, traditions or practices

This may also provide significant information with regard to whether the item is genuine or not, and if there are any doubts or questions about how it was obtained.

These consultations are especially important in relation to items of Aboriginal Peoples and Torres Strait Islanders cultural heritage. Such consultations must be based on a collaborative relationship with the Traditional Owners or authorised representatives of the relevant communities, through the networks already established by the Museum and with the support of appropriate staff; such as the Manager Repatriation and Community Engagement and the Indigenous Engagement Coordinator. In all cases staff must adhere to the protocols outlined in *QM321 Protocols for Community Consultation* and may be required to complete a *QM322 Cultural and Sensitive Material Checklist*. This process will ensure that the Museum has consulted with relevant stakeholders in the community to whom the cultural material proposed for acquisition, inward loan or display may relate.

Where an Aboriginal object or Torres Strait Islanders object is to be provided protection under the Protection of Cultural Objects on Loan Scheme, consultation is mandatory.

4.2 Accountability and Transparency

To minimise potentially damaging legal or ethical issues later on, staff must ensure that the **due diligence** process is fully documented and all information is scanned and attached to the relevant record in Vernon (where one exists) and hard copies kept in the appropriate file located in the Collections and Research Records area (whether that is the designated CRRC located in the QM&S Library or a campus / Collection specific repository) in accordance with *QM319 Collections and Research Record Keeping Procedure*.

Provenance documentation provided by vendors, donors or lenders can often be incomplete and it may not be possible to substantiate a complete provenance history. In these situations staff must consider:

- is there sufficient information to make an informed judgement about how the item came into the custody of the current vendor, donor or lender?
- is there sufficient information to make an informed judgement about whether the item was legally exported from its country of origin and whether its importation into Australia was, or will be, in accordance with either the Protection of Movable Cultural Heritage Act or CITIES?

This information must be made available to the **Senior Decision Maker** along with a completed *QM320 Collection Checklist* in order to inform the final decision about whether to proceed with the acquisition or loan (as outlined in *QM199 Procedure for Acquisition (Biodiversity & Geosciences)* and *QM45 Procedure for Acquisition (Cultures & Histories)* and *QM36 Procedure for Inward Research Loan* and *QM73 Procedure for Inward Exhibition Loan*).

If after all considerations are made, doubt still exists about the legal or ethical status of the item, the Museum may decide not to proceed with the acquisition or loan. However, the Museum acknowledges that some objects and specimens for which provenance information is incomplete or unobtainable may still deserve to be publically displayed, preserved, researched and published because of their rarity (such as Type specimens), significance (cultural or scientific) or historical interest. Ultimately the final decision will rest with the **Senior Decision Maker**. (Again, this decision, the assessment of all risks identified in the *QM320 Collection Checklist* and the reasons for the final decision must be fully documented in accordance with *QM319 Collections and Research Record Keeping Procedure*.)

In the case of biological specimens, it may be advisable to contact the **Department of Environment and Heritage Protection** (DEHP) (such as the *Manager of Threatened Species* or the *Director of Wildlife Management*) to discuss legal and ethical concerns further. They may be able to issue a '*letter of comfort*' to the Museum for 'moral assurance' or they may be able to issue a permit in order to provide support for the acquisition or loan to go ahead. If this is the case such a letter or permit must be obtained prior to embarking on any further process.

Through the process of **due diligence**, if staff think there is evidence that an item has been illegally acquired by the current vendor, donor or lender, they must report their suspicions to the **Senior Decision Maker**, who will be responsible for passing the information to the appropriate local, state or territory authorities (such as the DEHP) in the first instance and if necessary to the relevant national and international lists such as the *Art Loss Register* and *UNESCO Red Lists*.

The Museum may accept custody and control of material without legal title. This may occur when items are transferred to the Museum as a result of statutory requirements such as through state heritage legislation; in relation to shipwrecks or archaeological material or Voucher Specimens of animal material used for biodiscovery purposes. Also material may

be deposited at the Museum by request of Traditional Owners, such as Secret / Sacred objects or human remains. In these cases staff must be aware that the relevant legal and QM procedures in relation to this type of material will override the procedures as outlined here.

4.2.1 Publication of information with regard to Incoming International Exhibitions

The Program staff member who is responsible for organising incoming international loan objects for exhibition (or the Senior Creative Producer, Major Projects (or their delegate/equivalent at QMN campuses) who is responsible for organising incoming international **pre-packaged exhibitions**) must request from the lender all relevant documentation required to address the specific publishing requirements of the guidelines of the Protection of Cultural Objects on Loan (PCOL) Scheme under the *Protection of Cultural Objects on Loan Act 2013* as outlined below.

This information must be supplied by the Program staff member or Senior Creative Producer, Major Projects, as soon as it is available (but preferably **8 weeks** prior to the items being imported into Australia) to the Manager, Online Services via Servicedesk. The Manager, Online Services will then ensure the information is in a web accessible format and publish it on the Museum's web page:

<http://www.network.qm.qld.gov.au/About+Us/Corporate+information/Protection+Cultural+Objects+On+Loan+Scheme>

This must be done at least **4 weeks** before the objects are due to be imported into Australia. This information will then remain on the website for the duration of the loan and will be removed by the Manager of Online Services when the material is exported from Australia.

(If a loan object or **pre-packaged exhibition** is touring Australia and being exhibited at more than one venue, the 'lead' or 'approved' institution must publish a list of all objects while the other venues must provide a hyperlink to the lead institutions webpage where all the required PCOL information has been published.)

The information required for publishing includes the following:

- thumbnail ID image of each object
- one of the following:
 - the name of the lender (or if there is more than one entity, the name of each.
 - the name of the person authorised to act on the lender's behalf (or if there is more than one lender, a person who is authorised to act on behalf of each lender)
 - if the lender is a private lender who does not wish to be known publically a statement such as 'private lender', 'private collection' or similar.
- A description of each object including as much of the following information as the Museum is able to ascertain:

- type of object (e.g. painting, carving, jewellery etc.)
 - name and nationality of the artist, manufacturer or creator
 - title of the object
 - dimensions of the object
 - date when the object was created (or date range)
 - description of significant or identifying marks
 - the place where the object was created, manufactured or found
 - provenance information (including date and place the object was acquired by its current owner and where possible the owner before that)
- The period of display and the name of the exhibition.

4.2.2 Protection of Cultural Objects on Loan Annual Report

A *PCOL Annual Report* must be provided to the Ministry for the Arts on their reporting template for the preceding financial year, due on **31st October** each year. This is a requirement of the scheme and includes information relating to any inward international loans outlining all the provenance research and due diligence undertaken as well as outlining all consultations undertaken and confirming the publication requirements were met. It also requires information to be provided in regard to any claims received during the year.

4.3 Opt-out of protection for international loans

The Museum notes that all objects imported for loan under the PCOL Act are afforded automatic protection. However there may be some circumstances where the Museum may not want protection to extend to particular objects.

In these circumstances the Museum will liaise with the lender regarding the decision to opt-out and the lender will be advised that the objects imported will not be protected.

The Museum is required to advise the Minister for the Arts of its intention to opt-out of protection at least **4 weeks** prior to their importation into Australia.

Where the Museum opts-out of protection it is not required to undertake consultation or publication.

4.4 Claims and restitution

In the event that an individual, group or institution lodges with the Museum an enquiry or claim with regard to restitution, return, custodianship or ownership, provenance or authenticity; staff are required to follow the process as outlined in *QM 308 Consideration of Claims Procedure* in a professional, timely and sensitive manner.

4.5 Responsibilities

The Code of Conduct prescribes standards for the ethical behaviour of QMN staff and volunteers. In all activities relating to the Collections an employee must not be in conflict of interest with the purposes of QMN. If a conflict develops, the interests of QMN will take precedence.

Responsible officers:

- Collection Managers / Curators – are responsible for implementation of QMN Procedures in relation to Inward and Outward Loans (and in regard to international loans for ensuring adherence to PCOL regulations) as well as acquisitions in accordance with **due diligence**.
- Program Head – is responsible for assessing potential risks and providing that information to the overall **Senior Decision Maker** who will ultimately decide whether a loan or acquisition goes ahead.
- Senior Creative Producer (or their delegate/equivalent at QMN campuses) – responsible for managing **‘pre-packaged’ exhibitions** including contractual requirements and all necessary permissions related to the loan of objects under such contracts.
- Manager, Online Services – is responsible for assisting in the process of publishing information on the QMN website in accordance with PCOL requirements.
- Director, Collections, Research and Lifelong Learning, CEO, QM Board – are all potential **Senior Decision Makers** depending on what level of approval is being sought.

5.0 POLICY BASE

This document was informed by the *Australian Best Practice Guide to Collecting Cultural Material* produced by the Ministry for the Arts. The Queensland Museum is compliant with the Australian Government’s *Protection of Cultural Objects on Loan Act 2013*, *Protection of Cultural Objects on Loan Regulation 2014*, *Protection of Movable Cultural Heritage Act 1986* and the *Environmental Protection and Biodiversity Conservation Act 1999* and adheres to all obligations under the *CITES Convention 1975 on International Trade in Endangered Species of Wild Fauna and Flora*.

In addition the **QM78 QMN Collection Policy (Appendix 2)** outlines all the underlying regulations, legislation and general requirements relevant to the application and interpretation of this procedure.

6.0 DOCUMENT HISTORY

VERSION	DATE	AMENDMENT
0.1	August 2015	Original document circulated for comment

0.2	Sept 2015	Input from staff at Dept. of Environment and Heritage Preservation
1.0	Sept 2015	Final document
1.1	March 2016	Updated to include comments supplied via the Ministry for the Arts
1.2	June 2016	Updated to include additional comments supplied via the Ministry for the Arts

7.0 AUTHORISATION

Approved by:	Prof. Suzanne Miller
Title:	CEO, QMN
Signature:	
Approval date:	December 2016

8.0 MORE INFORMATION

Policy owner/creator:	Head, Collection Services
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9.0 REVIEW PROCESS

This document will be reviewed every 2 years and at other times if any significant new information or legislative or organisational change warrants a change to this document.

Once printed this document is no longer a controlled document.